

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CHARLOTTE CARMACK, individually §
and on behalf of other similarly situated, §
§
Plaintiff, §
§
V. § CIVIL ACTION NO. 3:16-cv-03500-D
§
PARK CITIES HEALTH CARE, LLC, §
and SHARON D. QUICK, §
§
Defendants. §

**DEFENDANTS' REPLY TO PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES the Defendants, Park Cities Healthcare, LLC and Sharon D. Westen, and file this, their response to Plaintiffs' Motion for Summary Judgment, and in connection therein would show:

1.

Plaintiffs are not entitled to Partial Summary Judgment herein.

2.

There are genuine issues of facts on Plaintiffs' asserted FLSA claims.

3.

Pursuant to the Rules, Defendant adopts and incorporates the more detailed objections and asserted deficiencies to Plaintiffs' claims as set forth in more detail in Defendants' accompanying brief to this Reply.

WHEREFORE, PEMISES CONSIDERED, Defendants pray that Plaintiffs' Motion for

Partial Summary Judgment be in all respects denied.

RESPECTFULLY SUBMITTED,

WARD LEGAL GROUP, PLLC

By: /s/ Lloyd E. Ward
Lloyd E. Ward
Texas Bar No. 20845100
12802 North Central Expressway
North Central Plaza III, Suite 460
Dallas, Texas 75243
(214) 736-1846 (Main)
(214) 736-1833 (Telecopier)
lward@lloydward.com

CERTIFICATE OF SERVICE

I certify that on March 21, 2018 a true and correct copy of Defendant's Reply to Plaintiff's Motion for Summary Judgment was served to each person listed as follows:

Via E-File:

Barry S. Hersh
bshersh@hersh-law.com
**ATTORNEY FOR CHARLOTTE CARMACK
AND JOVAN ANIAGU**
3626 N. Hall Street Suite 800
Dallas, TX 75219
TEL: (214) 303-1022
FAX: (214) 550-8170

/s/ Lloyd E. Ward
Lloyd E. Ward